

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

IN RE

THE COOKIE FACTORY, LLC,

Debtor

APPLICATION BY TRUSTEE AND
THE LAW FIRM OF WHICH HE IS A
MEMBER TO ACT AS ATTORNEY
FOR THE ESTATE, AND
DECLARATION

Case No. 24-11002

Chapter 7

TO: HON. ROBERT E. LITTLEFIELD, JR.
UNITED STATES BANKRUPTCY JUDGE

MARC S. EHRLICH, ESQ., affirms under penalty of perjury the following:

1. I am the duly qualified and acting Trustee in this case.

2. Applicant requires the assistance of counsel for the following purposes:

a. To represent the Trustee in filing any necessary motions ancillary to
represent the Trustee in evaluating a potential Fraudulent Conveyance
Cause of Action.

3. It is in the best interest of this estate and its economical administration that
Ehrlich Law Firm, PC of which applicant is a member, be authorized to act as
attorney for the Trustee of the estate for the following reasons:

a. To insure that all legal documents submitted to the Court by the
Trustee are proper and adequate;
b. To insure that all outstanding assets of the bankruptcy estate are
properly and swiftly collected, by litigation if necessary.

4. The Court has the power to authorize said employment pursuant to 11 U.S.C.

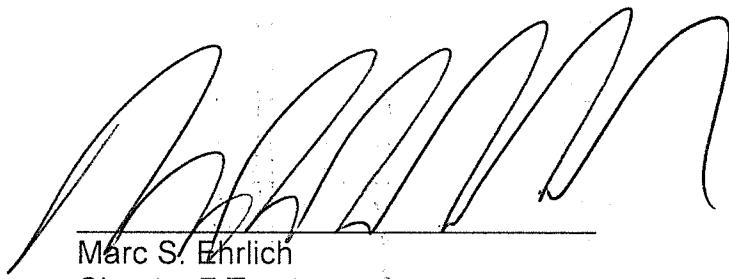
Section 327(d) which reads as follows:

"The Court may authorize the Trustee to act as
attorney or accountant for the estate if such

authorization is in the best interest of the
estate."

5. Applicant shall make application to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow only upon subsequent application to this Court.

DATED: September 25, 2024



Marc S. Ehrlich
Chapter 7 Trustee
64 Second Street
Troy, NY 12180
518 272 2110